

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:  ETHICON WAVE 2 CASES LISTED IN EXHIBIT A</b>	

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE OF  
DEBRA FROMER, M.D. FOR WAVE 2**

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert response filed in relation to Debra Fromer, M.D. in Ethicon Wave 1, Case No. 2:12-md-02327, ECF No. 2151 (memorandum in support of opposition). Defendants respectfully request that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing. This notice applies to the Wave 2 cases identified in Exhibit A attached hereto.

Respectfully submitted,

August 8, 2016

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**EXHIBIT A**

	<b>WAVE 2 CASE NAME</b>	<b>CASE NO.</b>
1.	Cynthia Eaton v. Ethicon, Inc., et al.	2:12-cv-01348
2.	Carreen and Matthew Schroeder v. Ethicon, Inc., et al.	2:12-cv-01327

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Kelly S. Crawford

Kelly S. Crawford